September 16, 2003

Concerning a Petition for Rulemaking RM-10787 filed by the National Council of Volunteer Examination Coordinators (NCVEC)

To the FCC:

I am writing to strenuously oppose the request for elimination of Element 1A as a requirement for US-licensed amateur radio operators to have operating privileges below 30 Mhz, with the following exception: I support eliminating the requirement for Element 1A in order for Technician licensees to have equivalent HF operating privileges as Technician Plus (or Technician-with-code) licensees, namely HF access to the Novice HF sub-bands with all operating restrictions (mode and power).

The NCVEC has raised several objections to continued Morse testing, none of which are compelling. Certainly the objection that Morse testing is onerous and a burden is untrue to anyone who has taken an amateur radio examination in the past few years... it is as simple if not simpler than taking any of the written Elements. The VEs merely hand an applicant a small cassette player with headphones, a piece of paper and pencil, and let him sit at a desk for five minutes. The tape is brought back, the written test is given, and the applicant either passes or fails. The only indication I can get from this argument is that too many unqualified people are being accepted as Volunteer Examiners!

The NCVEC also asserts that Morse proficiency is not an indicator of overall quality of amateur radio operation. But that is besides the point. Since all of the questions, and answers, for Elements 2, 3, and 4 are readily available, these tests can be passed by anyone who is willing to memorize enough answers rather than seeking an understanding of the information that the questions purport to verify. This is not true of Element 1; there is no way to memorize enough Morse audio to pass the test unless the applicant has a sufficient level of skill with Morse. The fact that Element 1A does require effort (between 10 and 30 hours for most applicants) allows the applicant to demonstrate commitment, perseverance, and a willingness to abide by the rules of the Commission rather than seeking to evade or eliminate these rules. It is just human nature for people to value something that is earned more than something that is given. Therefore, the licensee who exerts this much effort will value his license as a symbol of accomplishment and is much less likely to engage in behavior that contravenes FCC rules and regulations and thus threatens his continued exercise of his privileges.

Since 1990, although the total number of US amateur radio licensees has only increased by about 6,500 the vast majority (two-thirds) of the increase has been into the General-and-above HF-privileged license classes, and only one-third of new licensees have chosen to earn only Technician privileges. HF, and particularly HF QRP CW, is the fastest growing segment of amateur radio. The reduction of the code requirement to 5 wpm in April 2000 has worked in that it has encouraged MOTIVATED potential hams to earn their

licenses.

NCVEC also asserts that more recent HF digital modes are superior to Morse in every way. Of course, this is not true as any amateur knows from experience... there are times when the fanciest HF digital mode doesn't work but Morse still gets thru. A simple example is communications between the Pacific Northwest of the US and Europe across the poles... most HF digital modes will not work with interference from auroral flutter while Morse is still copyable.

The purposes of the amateur radio service are manyfold, but include encouragement
of self-study in electronics and radio operation, and unlike commercial communications systems amateurs need to use their service for training and familiarization in normal situations, and as an adjunct or alternative in emergencies. The amateur radio service is NOT meant to be a utility service that replaces current commercial communications systems including the cellular phone network, the long distance network, or the Internet. It is not unreasonable to require, and expect, amateur radio operators to be willing to put forth the time and effort to obtain and maintain a minimal level of competence in modes that may be useful to the community and the nation in emergencies; that is the price we pay for having access to portions of the radio spectrum. I for one find it appalling that the national organization responsible for examinations wants to ease testing requirements. What are these people thinking, and do they really represent the best interests of the amateur community? I think not.

NCVEC neglects to answer the question of "What do you use when you have a simple radio but no computer?" They point out emergencies where other modes were available, but fail to point out any situations in the past decade where ONLY Morse was available and it saved lives. Emergencies are worst-case scenarios, and while if possible we want to use the most advanced means of communications available with the equipment at hand, sometimes that means using Morse code. What will we do if NCVEC's petition is approved, Morse is no longer a requirement
for HF privileges, and we suffer a national calamnity that includes prolonged shutdown of the power grid and/or transportation network? Then, simple CW transceivers, simple wire antennas, solar-charged AA batteries, and Morse code will work when all of the fancy computers are silent with no grid power and no fuel for generators... but only if we have operators!

In summary, all of the licensing evidence available shows that 5 wpm has not been an impediment to HF licensing. On the contrary, based upon the FCC's licensing statistics, HF-privileged hams have grown by almost 40,000 (almost 20%) since the reduction of the code requirement to 5 wpm in 2000. No licensing indication shows that large numbers of potential licensees are discouraged by the relaxed code requirement. The figures DO show that the numbers of Technician licensees has decreased substantially since April 2000, and also indicate that the majority of Technician licensees will not renew their licenses once their initial ten-year period expires. In my opinion this is due to the fact that the majority who strive for the Technician license lack sufficient interest in HF operations or radio in general to be willing to commit to studying for the 20 to 30 hours that it would take to pass Elements 1A and 3. Instead, they obtain their license for utilitarian purposes and quickly find that other means of communications, such as cell phones, are more useful in everyday life. Getting rid of the Morse requirement will not substantially increase the number of amateur radio licensees, but it will result in less-trained people having access to bands where inadvertant operating

mistakes can have regional, national, or world-wide implications.

We need to keep Element 1A for General-and-above licensees, grant no-code Technicians Technician-with-code privileges, and then monitor license and operating activities for a couple of years. No-code Techs can use modern technology in the form of readily-available computer programs to decode and encode Morse so they can operate on the HF bands, and as a benefit this exposure to Morse will almost certainly allow most no-code Techs to easily pass Element 1A after a year or so of casual Morse operation. Further, keeping no-code Techs in the Novice sub-bands will reduce the possibility of inadvertant interference to higher license classes who have earned their privileges while increasing operations in underutilized band segments. Taking these steps and monitoring the outcome for a few years will best give us the information we need before we go further and consider eliminating any code requirement.

Sincerely,

John Clifford
KD7KGX
Bellevue, Washington